


FILED

FEB 1 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

UNITED STATES OF AMERICA

VS.

AMEER BADR

§
§
§
§
§
§
§
§
§

CAUSE

NO.:

DR23-3408M

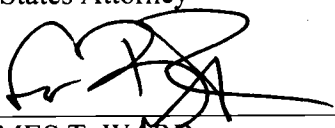
STIPULATION OF FACTS

The United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant U.S. Attorney, the Defendant, and Defense counsel hereby stipulate that if this matter were to proceed to trial, the United States would establish by legal and competent evidence the following facts beyond a reasonable doubt:


On December 7, 2023, AMEER BADR (hereinafter "Defendant") unlawfully entered the United States near Eagle Pass, Texas, within the Western District of Texas, at a time and place other than that designated by United States immigration officials for the entrance of immigrants into the United States. Defendant is an alien and citizen of Syria. Defendant intentionally and knowingly failed to enter the United States at a designated border crossing point designated by immigration in violation of Title 8 United States Code, Section 1325(a). The Defendant committed all of the foregoing acts knowingly and voluntarily with the specific intent to violate the law.

Respectfully submitted,

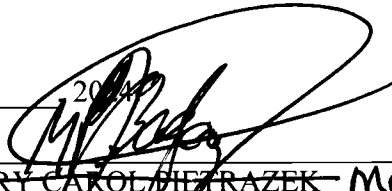
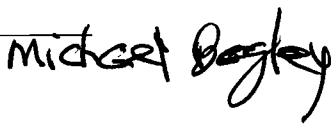
JAIME ESPARZA
United States Attorney

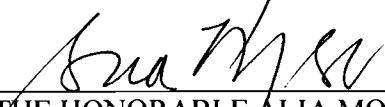
By: 
JAMES T. WARD
Assistant United States Attorney

I have carefully read and reviewed the entirety of this Stipulation of Fact, or it has been read to me (and if necessary, translated for me) and reviewed with me by my attorney. After careful consideration and discussion with my attorney, and fully understanding my rights with respect to the pending criminal charge(s), I knowingly and voluntarily agree the above Stipulation of Facts is true and accurate, and had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Signed this 1st day of Feb., 2024.

AMEER BADR
Defendant

I am counsel for Defendant. I have fully explained to Defendant all of Defendant's rights with respect to the pending criminal charge(s). I have carefully reviewed this Stipulation of Fact in its entirety with Defendant and provided Defendant with my best professional advice. In my opinion, Defendant's decision to agree to this Stipulation of Fact made voluntarily, and with full knowledge of its obligations and consequences.

Signed this 1st day of Feb., 2024.

~~MARY CAROL PIETRAZEK~~ 
Defendant's Attorney

Adopted and approved this 1st day of February, 2024.

THE HONORABLE ALIA MOSES
Chief United States District Judge